

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHRISTOPHER RICHARD CHAPIN,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA, MICROSOFT
CORPORATION, and the MICROSOFT
CORPORATION WELFARE PLAN,

Defendants.

No. 2:19-cv-01256

REPLY DECLARATION OF
MCKEAN J. EVANS IN SUPPORT OF
CHAPIN'S MOTION FOR AWARD
OF ATTORNEYS' FEES, COSTS,
AND INTEREST

MCKEAN J. EVANS makes the following declaration based on personal knowledge:

1. I am over 18 years of age. I am competent to testify. The facts contained in this Declaration are based on my personal knowledge, unless stated otherwise.

2. I am the attorney representing Plaintiff Chapin in this matter.

3. Attached hereto as Exhibit A is the April 28, 2021 Order Granting Plaintiffs' Motion and Declaration for Attorneys' Fees, *Kukoleca v. All New Again LLC*, Case No. 20-2-16267-1 SEA (King Cty. Super. Ct.).

1 4. I incurred 8.2 hours preparing the reply brief in support of Chapin's Motion for
2 Award of Attorneys' Fees, Costs, and Expenses. This time is memorialized in contemporaneous
3 electronic time records and is reflected in Exhibit B hereto.

4 **I declare under penalty of perjury of the laws of the State of Washington and the**
5 **laws of the United States of America that the foregoing is true and correct.**

6 Dated April 30, 2021, at Seattle, Washington.

7
8 *s/ McKean J. Evans*
9 MCKEAN J. EVANS

EXHIBIT A

SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

DALIBOR KUKOLECA and
GWENDOLYN KUKOLECA,

Plaintiffs,

v.

ALL NEW AGAIN LLC, a Washington
limited liability company,

Defendant.

No. 20-2-16267-1 SEA

ORDER GRANTING PLAINTIFFS'
MOTION AND DECLARATION FOR
ATTORNEYS' FEES

THIS MATTER having come on duly and regularly before the Court upon Plaintiffs' Motion and Affidavit for an Award of Attorneys' fees from Defendant All New Again, LLC ("ANA"). The Court having reviewed the motion, ANA's response, Plaintiffs' reply, the pleadings and records herein, and otherwise being duly informed in the premises; now, therefore, it is hereby

ORDERED, ADJUGED, AND DECREED that:

1. Plaintiffs motion to compel is GRANTED;
2. The Court finds that Plaintiffs reasonably incurred 4.5 hours of attorney time in connection with bringing their motion to compel discovery and preparing their fee motion.

3. The Court finds that Plaintiffs reasonably incurred an additional 1.2 hours of attorney time in preparing their reply brief in support of their fee motion.

4. The Court finds that Plaintiffs reasonably incurred \$64.98 in costs in connection with the above.

5. The Court finds that the hourly rate of \$475 is reasonable in light of Attorney McKean J. Evans' qualifications, skill and experience.

6. The Court awards attorneys' fees and costs to the Plaintiffs in the amount of \$2772.48.

7. ANA shall pay the fee and cost award to Plaintiffs' counsel within seven days.

IT IS SO ORDERED.

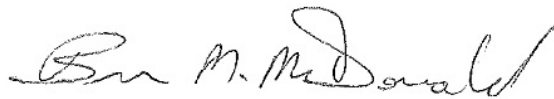
Dated this _____ day of _____, 2021.

The Honorable Brian McDonald
King County Superior Court Judge

King County Superior Court
Judicial Electronic Signature Page

Case Number: 20-2-16267-1
Case Title: KUKOLECA vs ALL NEW AGAIN
Document Title: ORDER

Signed By: Brian McDonald
Date: April 28, 2021



Judge: Brian McDonald

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: EB2FC2BCB5DEBEA152D5B8D72B65DAFD8D8A64C1
Certificate effective date: 9/9/2019 6:12:37 PM
Certificate expiry date: 9/9/2024 6:12:37 PM
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,
O=KCDJA, CN="Brian McDonald:
ylMMEpRJ6RGYICi3jC1lQQ=="

EXHIBIT B

Date	Time-keeper	Rate	Hours	Value	Description
04/27/21	McKean J. Evans	475.00	0.80	\$380.00	Outline reply re fee petition
04/27/21	McKean J. Evans	475.00	1.10	\$522.50	Review opposition to fee petition
04/28/21	McKean J. Evans	475.00	3.40	\$1,615.00	draft reply re fee motion
04/30/21	McKean J. Evans	475.00	2.90	\$1,377.50	Draft reply brief re fee petition
TOTAL			8.20	\$3,895.00	